

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

Criminal No. 4:15-CR-151-O

TONYA BLACKWOOD (03)  
CHARLES DEEDS (09)  
WINFRED MORGAN TRAMMEL (22)

AMENDED NOTICE OF EXPERT TESTIMONY

TO THE HONORABLE REED O'CONNOR, U.S. DISTRICT JUDGE:

The United States of America in its Amended Notice of Expert Testimony, and would respectfully show this Court as follows:

The government expects to call D. Michelle O'Neal, Senior Forensic Chemist, Office of Chief Medical Examiner and Forensic Laboratories, Tarrant County Medical Examiner's District, to testify as to his/her opinion about narcotics seized in this case.

The government expects to call Christina Coucke-Garza, Senior Forensic Chemist, Office of Chief Medical Examiner and Forensic Laboratories, Tarrant County Medical Examiner's District, to testify as to his/her opinion about narcotics seized in this case.

The government expects to call Jason Earl Allison, Senior Forensic Chemist, Fort Worth Police Department, Crime Laboratory, to testify as to his/her opinion about narcotics seized in this case.

The government expects to call Mary Avalos Belli, Forensic Scientist, Texas DPS Abilene Crime Laboratory, to testify as to his/her opinion about narcotics seized in this case.

The government expects to call DEA Agent Brian Finney, or another qualified expert, to testify from his expertise on techniques and processes unique to drug trafficking, including but not limited to the use of coded language.

Respectfully Submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY

/s/ Shawn Smith  
SHAWN SMITH  
Assistant United States Attorney  
State Bar of Texas No. 24033206  
801 Cherry Street, Unit #4  
Burnett Plaza, Suite 1700  
Fort Worth, TX 76102-6897  
Telephone: 817-252-5200  
Facsimile: 817-252-5455  
E-mail: [shawn.smith2@usdoj.gov](mailto:shawn.smith2@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2015, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Shawn Smith  
SHAWN SMITH  
Assistant United States Attorney